

KNA PARALEGALS AND CONSULTANTS

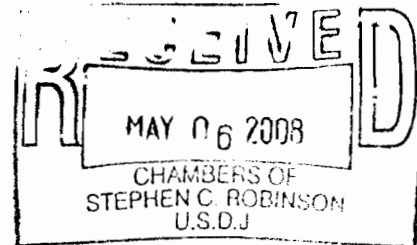
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May 02, 2008

United States District Court
Southern District of New York
300 Quarropas Street, Room 633
White Plains, New York 10601
Honorable Stephen C. Robinson, USDJ



MEMO ENDORSED

Re: Rodriquez v. KNA Paralegals & Consultants, Angela DiPilato and Kenneth A. Frank.
Civil Action No.: 08-Civ.-3691

Plaintiffs Motion to Remand / Briefing Schedule

Your Honor:

I respectfully address the Court on behalf of all the above-named defendants. I am in receipt of the plaintiffs proposed briefing schedule. I remain uncertain about plaintiff's attorneys reference to a telephone call from the court, as defendants did not receive a call from the court.

It seems, that plaintiffs counsel is suggesting that answering memoranda and affidavits be served upon him by May 16, 2008. This schedule would be impossible for all the defendants to comply with.

Ms. DiPilato is out of the State at this time. She will not be returning until May 11, 2008. Thus, I will not be able to confer with her until such time.

As such, I would respectfully request that the honorable court allow us thirty (30) days from Ms. DiPilato's return to properly prepare and submit our opposition. I humbly propose a date on or about June 11, 2008 for the defendants papers in opposition.

SO ORDERED


**STEPHEN C. ROBINSON
UNITED STATES DISTRICT JUDGE**

6/4/08

Thank you for the courts kind consideration. I await a response.

Very truly yours,


Kenneth A. Frank

cc: Scott Stone, PC.
44 Church Street
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